

April 30, 2021

**VIA ECF**

The Honorable Steven I. Locke  
U.S. District Court, E.D. New York  
Long Island Courthouse  
100 Federal Plaza,  
Central Islip, NY 11722

Re: *Signify North America Corporation et al., v. Satco Products, Inc.*, 2:19-cv-06125-JMA-SIL

Dear Magistrate Judge Locke:

Pursuant to the Court's March 31, 2021 Order (Dkt. No. 144), the parties submit this joint status letter proposing the following schedule for royalty-related discovery:

Deadline	Agreed Date
Satco to identify twelve licenses for which Satco seeks further discovery and issue the corresponding discovery requests (i.e., interrogatories and/or requests for production) to Signify	7 days after Signify makes its final election of asserted claims
Signify to issue responses and objections, if any, and produce non-objectionable documents and information responsive to Satco's discovery requests	30 days after Satco issues discovery requests as to the twelve identified licenses

The parties agree to engage in a reasonable meet-and-confer process, if necessary, to resolve any disputes arising out of the above schedule. If disputes arise that may prevent the parties from completing fact discovery within 90 days after the Court's claim construction ruling pursuant to the Scheduling Order (Dkt. No. 62), the parties will work together in good faith in seeking any necessary extension of the schedule. The parties will continue to keep the Court apprised of the status of the discovery.

Respectfully submitted,

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